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February 16, 2022

**BY ECF**

Honorable Loretta A. Preska  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re:    *Prince v. The Intercept, et al.,*  
Case No. 21 Civ. 10075 (LAP)**

Dear Judge Preska:

We represent plaintiff Erik Prince in the above-referenced matter. We write to respectfully request an approximately three week extension of time to respond to the motion to dismiss filed by defendants First Look Media Works, Inc. ("First Look") and Matthew Cole [ECF No. 15], which response is currently due on February 25, 2022.

The reason for this request is that defense counsel has informed us that remaining defendant Alex Emmons intends to file his own motion to dismiss. Mr. Emmons's motion is presently due by March 7, although defense counsel has informed us that Mr. Emmons intends to file his motion on or about February 25. Plaintiff therefore requests that his time to respond to First Look and Mr. Cole's motion be extended to three weeks from the date that Mr. Emmons files his motion. The requested extension will permit Plaintiff to submit a single opposition to all of the motions to dismiss, which we respectfully submit is in the interests of efficiency for everyone involved. (Upon reviewing Mr. Emmons's motion, which is anticipated to raise additional arguments, it is likely Plaintiff will seek a page extension for that consolidated opposition.)

Defendants do not oppose this request. This is Mr. Prince's first request for an extension of time to respond to defendants' motion to dismiss, and the extension will not affect other scheduled dates.

Respectfully,

/s/ Matthew L. Schwartz  
Matthew L. Schwartz

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